

BEFORE THE
Federal Communications Commission

WASHINGTON, D.C. 20554

In the Matter of)

Telephone Number Portability)

CC Docket No. 95-116
RM 8535

To: The Common Carrier Bureau

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REPLY COMMENTS OF MOBILEMEDIA COMMUNICATIONS, INC.

MobileMedia Communications, Inc., the parent company of MobileMedia Paging, Inc. and Mobile Communications Corporation of America (collectively "MobileMedia"), hereby replies to the comments submitted in response to the Common Carrier Bureau's request for further comments on telephone number portability, *Public Notice*, DA 96-358 (released Mar. 14, 1996), *summarized*, 61 Fed. Reg. 11,174 (Mar. 19, 1996).

DISCUSSION

In its comments, MobileMedia demonstrated that the imposition of a number portability requirement for competitive wireless markets like paging is neither appropriate nor technically feasible at this time, and that the Telecommunications Act of 1996 ("1996 Act")¹ imposes a duty to provide number portability solely upon local exchange carriers ("LECs").² Among those parties addressing wireless issues specifically, there was near uniform consensus that the record does not currently support wireless number portability rules and that this issue should be

¹ Pub. L. No. 104-104, 110 Stat. 56 (1996).

² The 1996 Act adds new Section 251(b)(2) to the Communications Act, which imposes on LECs, "the duty to provide, to the extent technically feasible, number portability in accordance with requirements prescribed by the Commission." 47 U.S.C. § 251(b)(2); see MobileMedia Comments at 3-10.

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deferred to a future proceeding to the extent necessary.³ MobileMedia agrees with Bell Atlantic that: “(1) the concerns that the Commission voiced as to the need for wireline number portability [do] not apply to wireless providers; (2) there [are] numerous distinct and substantial technical obstacles to *wireless* number portability; and (3) there [is] no current subscriber demand for wireless portability.”⁴

MobileMedia restates herein that the competitive reasons for imposing number portability requirements upon LECs are absent for CMRS providers,⁵ particularly paging carriers. As the Commission has repeatedly found, the paging industry is “highly competitive,” and that while some paging customers may be reluctant to change their numbers, they nevertheless may do so.⁶ In fact, MobileMedia noted in its comments that approximately 18% of the churn among paging subscribers is due to competition.⁷ Further, no commenters disagreed with the conclusion of MobileMedia that interim call-forwarding solutions are generally not currently technically feasible for paging carriers, and would require expensive and unnecessary replacement of

³ See Comments of AirTouch Paging and Arch Communications Group (“Arch”) at 3-4; Bell Atlantic NYNEX Mobile, Inc. 1-2; BellSouth Corp. and BellSouth Telecommunications, Inc. (“BellSouth”) at 6-7; Personal Communications Industry Association (“PCIA”) at 2-3; SBC Corp. (“SBC”) at 3; *see also* Omnipoint Corp. (“Omnipoint”) at 2 n.4. *But cf.* AT&T Comments at 6 n.8 (asserting that there should be a phased-in deployment of number portability for wireless carriers to allow for the more extensive modifications required for their networks); Cox Enterprises, Inc. Comments at 4 n.4 (arguing that the definition of service provider portability should include portability between wired and wireless carriers).

⁴ Bell Atlantic NYNEX Mobile Comments at 1-2.

⁵ See *Annual Report and Analysis of Competitive Market Conditions with Respect to Commercial Mobile Services, First Report*, 10 F.C.C.R. 8844, 8845, 8866-68 (1995).

⁶ *Regulatory Treatment of Mobile Services*, GN Docket No. 93-252, *Second Report and Order*, 9 F.C.C.R. 1411, 1468 (1994), *recon. in part*, 10 F.C.C.R. 7824 (1995).

⁷ MobileMedia Comments at 6 n.21.

existing one-way paging terminal trunks with general purpose equipment capable of switching and routing functions.

Instead, the commenters addressing wireless and paging issues agreed with the position advanced by MobileMedia that, in passing the 1996 Act, Congress determined to impose number portability requirements only on LECs and not on non-wireline CMRS providers.⁸ The commenters noted that the 1996 Act specifically excludes CMRS providers, including paging companies, from the definition of a LEC.⁹ Although Congress has given the Commission the authority to determine that commercial mobile service should be included in the definition of a LEC if circumstances warrant,¹⁰ MobileMedia agrees with BellSouth and AirTouch Paging and Arch that there is no record to support such a finding at this time.¹¹ In fact, the record demonstrates that number portability obligations should not be imposed on CMRS providers,¹² particularly narrowband services like paging.¹³

⁸ See Comments of AirTouch Paging and Arch at 4; Bell Atlantic NYNEX Mobile at 2-3; BellSouth at 6; Omnipoint at 2 n.4, 5; SBC at 3.

⁹ “The term ‘local exchange carrier’ . . . does not include a person insofar as such person is engaged in the provision of commercial mobile service under Section 332(c), except to the extent that the Commission finds that such service should be included in the definition of such term.” 47 U.S.C. § 153; see Bell Atlantic NYNEX Mobile Comments at 2-3; BellSouth Comments at 6; SBC Comments at 3.

¹⁰ 47 U.S.C. § 153; see *supra* note 9. Such circumstances would arise when the service provided by a CMRS carrier is “a replacement for a substantial portion of the wireless telephone exchange service” within a state. See H.R. Conf. Rep. No. 458, 104th Cong., 2d Sess. 115-16 (1996).

¹¹ See BellSouth Comments at 6 n.23; AirTouch Paging and Arch Comments at 4.

¹² See AirTouch Paging and Arch Comments at 4; Bell Atlantic NYNEX Mobile Comments at 1; BellSouth Comments at 6; PCIA Comments at 3.

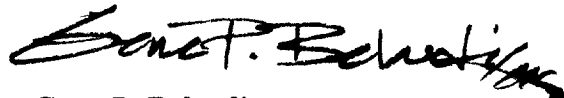
¹³ See PCIA Comments at 2-3; AirTouch Paging and Arch Comments at 2 & n.6, 4 (citing Initial Comments in CC Docket 95-185 of PCIA at 9; Paging Network, Inc. at 9; SBC
(continued...)

Finally, MobileMedia agrees with NYNEX and Sprint that the Commission should establish a further notice of proposed rulemaking to develop a comprehensive record to determine how to assess costs of establishing number portability among telecommunications carriers on a competitively neutral basis.¹⁴ For the same reasons discussed above and in its comments, MobileMedia submits that narrowband licensees should be treated fairly (and perhaps be exempted from) cost recovery requirements given the nature of their services. This issue should be examined in greater detail in a further notice.

CONCLUSION

Accordingly, MobileMedia reiterates its conclusion that the Commission should refrain from adopting broad-based number portability requirements at this time, particularly in the paging context where they are neither appropriate nor technically feasible, and focus instead upon the promulgation of LEC number portability rules necessary to implement the 1996 Act.

Respectfully submitted,



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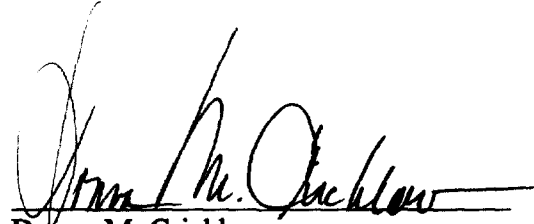
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¹³ (...continued)
Communications at App. F; Nextel Communications, Inc. at 5; Cincinnati Bell Telephone Company at 7).

¹⁴ NYNEX Telephone Companies Comments at 4; Sprint Corp. Comments at 5; *see* 47 U.S.C. § 251(e)(2).

CERTIFICATE OF SERVICE

I, Donna M. Crichlow, hereby certify that copies of the foregoing Reply Comments of MobileMedia Communications, Inc., in CC Docket 95-116, were sent via first class United States mail, postage prepaid, this 5th day of April, 1996, to the parties named on the attached service list.



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